



Seyfarth Shaw LLP

620 Eighth Avenue
New York, New York 10018

T (212) 218-5500

F (212) 218-5526

jegan@seyfarth.com

T (212) 218-5291

www.seyfarth.com

November 24, 2021

MEMORANDUM ENDORSED

VIA ECF

Hon. Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court for the Southern District of New York
500 Pearl Street, Courtroom 6B
New York, NY 10007

**Re: *Stevez v. University of Saint Joseph*,
Civil Action No.: 1:21-cv-08904-PAE-GWG**

Dear Judge Gorenstein:

This firm represents Defendant University of Saint Joseph ("Defendant") in the above-referenced action. We write, with Plaintiff's consent, to respectfully request an extension of the deadline to respond to the Complaint, up to and including December 27, 2021.

By way of background, Plaintiff filed the Complaint on October 29, 2021. (ECF No. 1.) Defendant was served on November 4, 2021. (ECF No. 7.) Accordingly, the present deadline for responding to the Complaint is November 26, 2021. We respectfully request that the deadline to respond to the Complaint be extended by 30 days, up to and including December 27, 2021.

This is the first request for an extension of this deadline which, if granted, will not affect any other scheduled dates. This request is not intended to cause undue delay, but instead to provide additional time for Defendant to investigate the Complaint allegations, and for the parties to discuss a potential non-litigated resolution. The undersigned has communicated with counsel for Plaintiff, and Plaintiff consents to this request.

The undersigned apologizes for submitting this request the day before the Thanksgiving holiday, given the close proximity to the November 26 responsive pleading deadline. However, the undersigned was engaged as counsel last evening and is filing this application at the earliest practicable opportunity. We thank the Court for its time and attention to this matter, and for its consideration of this application.



Hon. Gabriel W. Gorenstein
November 24, 2021
Page 2

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ John W. Egan

John W. Egan

cc: All counsel of record (via ECF)

Application granted. The deadline to respond to the Complaint is extended to December 27, 2021.

So Ordered.

A handwritten signature in black ink, reading 'Gabriel W. Gorenstein'.

GABRIEL W. CORENSTEIN
United States Magistrate Judge

November 24, 2021